

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

-vs- :

3:CR-13- 271

GREGORY BOONE a/k/a "C-Lo" :

and :

RANDY COLEMAN JR, a/k/a
"Holliday," :

Defendants

INDICTMENT

Count 1

(Conspiracy to Commit Sex Trafficking)

FILED
SCRANTON
DEC 03 2013
PER [Signature]
DEPUTY CLERK

In or about August 2013 to in or about September 2013, in Luzerne
County, Lackawanna County and Dauphin County, in the Middle
District of Pennsylvania, and elsewhere, the defendants,

GREGORY BOONE a/k/a "C-Lo"

and

RANDY COLEMAN, JR. a/k/a "Holliday,"

combined, conspired, and agreed with each other and with other persons
whose identities are known to the grand jury, to knowingly recruit,
entice, harbor, transport, provide, obtain, maintain by any means and
benefit financially and receive anything of value from participation in a
venture engaged in such acts, in and affecting interstate or foreign

commerce, C.A.G., C.R., L.R. and D.T., knowing and in reckless disregard of the fact, that C.A.G., C.R., L.R. and D.T. had not attained the age of 18 years and that C.A.G., C.R., L.R. and D.T. would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a) and (b)(2).

MANNER AND MEANS OF THE CONSPIRACY

1. The defendants and/or their co-conspirators recruited minors to engage in sex acts for compensation.

2. The defendants and/or their co-conspirators used cell phones to take photographs of minors engaging in sexually explicit conduct and used cell phones to post those photographs on a website named backpage.com. to solicit customers to engage in sex acts with those minors.

3. The defendants and/or their co-conspirators used cell phones to arrange for customers to engage in sex acts with minors.

4. The defendants and/or their co-conspirators rented motel rooms and used other locations in Luzerne, Lackawanna, and Dauphin Counties in Pennsylvania, for minors to use to engage in sex acts with

customers, and acted as "bodyguards" for the minors.

5. The defendants and/or their co-conspirators transported minors to motels/hotels in Luzerne, Lackawanna, and Dauphin Counties in Pennsylvania, to meet with customers to engage in sex acts for money.

6. The defendants and/or their co-conspirators provided condoms to minors to use when engaging in sex acts with customers.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendants and/or their co-conspirators committed the following overt acts, among others:

1. In or about August 2013, the defendant Gregory Boone persuaded a minor female to recruit minors to engage in sex acts for money.

2. In or about August 2013, a minor female recruited and attempted to recruit two minor females to engage in prostitution.

3. On or about August 23, 2013, the defendant Randy Coleman, Jr. rented a motel room at Super 8 Motel in Pittston, Pennsylvania, for minors to use to engage in sex acts with customers for money.

4. In or about August and September 2013, a co-conspirator took photographs of minors engaging in sexually explicit conduct.

5. In or about August 2013 to September 2013, the defendant Gregory Boone posted photographs of minors on backpage.com website.

6. In or about August and September 2013, the defendants used cell phones to arrange for customers to engage in sexual acts with a minor.

7. In or about August and September of 2013, the defendants used a vehicle to transport minors to a motel to engage in sex acts with customers for money.

8. In or about August 2013, the defendant s provided condoms to minors to use when engaging in sex acts with customers.

9. In or about August 2013, the defendants acted as "bodyguards" for minors engaging in prostitution.

10. In or about August and September of 2013, the defendants transported a minor to the Harrisburg area to engage in prostitution.

All in violation of Title 18, United States Code, Section 1594(c).

THE GRAND JURY FURTHER CHARGES:

Count 2
(Sex Trafficking of Children)

In or about August 2013 to in or about September 2013, in the
Middle District of Pennsylvania, the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury,
knowingly recruited, enticed, harbored, transported, provided,
obtained, and maintained by any means, and benefited financially and
received anything of value from participation in a venture engaged in
such acts, and attempted to do so, in and affecting interstate or foreign
commerce, C.A.G., C.R., L.R. and D.T., knowing and in reckless
disregard of the fact that C.A.G., C.R., L.R. and D.T. had not attained the
age of 18 years and that C.A.G., C.R., L.R. and D.T. would be caused to
engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and
(b)(2), and 1594(a) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 3
(Conspiracy to Produce Child Pornography)

In or about August 2013 to in or about September 2013, in the Middle District of Pennsylvania, and elsewhere, the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

combined, conspired, and agreed with each other and with other persons whose identities are known to the grand jury, to knowingly employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

1. The MANNER AND MEANS OF THE CONSPIRACY and OVERT ACTS sections of Count 1 of the Indictment are hereby incorporated by reference.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

THE GRAND JURY FURTHER CHARGES:

Count 4
(Production of Child Pornography)

In or about August 2013, in the Middle District of Pennsylvania,
the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury, did
knowingly employ, use, persuade, induce, entice, and coerce any minor,
C.A.G., to engage in sexually explicit conduct for the purpose of
producing any visual depiction of such conduct, knowing and having
reason to know that such visual depiction would be transported and
transmitted using any means and facility of interstate and foreign
commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 5
(Production of Child Pornography)

In or about August 2013, in the Middle District of Pennsylvania,
the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury, did
knowingly employ, use, persuade, induce, entice, and coerce any minor,
C.R., to engage in sexually explicit conduct for the purpose of producing
any visual depiction of such conduct, knowing and having reason to know
that such visual depiction would be transported and transmitted using
any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 6
(Production of Child Pornography)

In or about August 2013 to in or about September 2013, in the
Middle District of Pennsylvania, the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury, did
knowingly employ, use, persuade, induce, entice, and coerce any minor,
L.R., to engage in sexually explicit conduct for the purpose of producing
any visual depiction of such conduct, knowing and having reason to know
that such visual depiction would be transported and transmitted using
any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 7
(Conspiracy to Transport and Ship Child Pornography)

In or about August 2013 to in or about September 2013, in the
Middle District of Pennsylvania, the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

combined, conspired, and agreed with each other and with other persons
whose identities are known to the grand jury, to knowingly transport
and ship any visual depiction using any means or facility of interstate or
foreign commerce and in or affecting interstate or foreign commerce, by
any means including by computer, and the production of such visual
depiction involved the use of a minor engaging in sexually
explicit conduct and the visual depiction is of such conduct.

1. The MANNER AND MEANS OF THE CONSPIRACY and
OVERT ACTS sections of Count 1 of the Indictment are
hereby incorporated by reference.

All in violation of 18 U.S.C. § 2252(a)(1) and (b).

THE GRAND JURY FURTHER CHARGES:

Count 8
(Transporting and Shipping Child Pornography)

In or about August 2013, in the Middle District of Pennsylvania,
the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury,
knowingly transported and shipped any visual depiction using any
means or facility of interstate or foreign commerce and in or affecting
interstate or foreign commerce, by any means including by computer,
and the production of such visual depiction involved the use of a minor,
C.A.G., engaging in sexually explicit conduct and the visual depiction is
of such conduct,

In violation of 18 U.S.C. § 2252(a)(1) and (b) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 9
(Transporting Child Pornography)

In or about August 2013, in the Middle District of Pennsylvania,
the defendants,

GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury,
knowingly transported and shipped any visual depiction using any
means or facility of interstate or foreign commerce and in or affecting
interstate or foreign commerce, by any means including by computer,
and the production of such visual depiction involved the use of a minor,
C.R., engaging in sexually explicit conduct and the visual depiction is of
such conduct,

In violation of 18 U.S.C. § 2252(a)(1) and (b) and 2.

THE GRAND JURY FURTHER CHARGES:

Count 10
(Transporting Child Pornography)

In or about August 2013 to in or about September 2013, in the
Middle District of Pennsylvania, the defendants,


GREGORY BOONE a/k/a "C-Lo"
and
RANDY COLEMAN, JR. a/k/a "Holliday,"

aiding and abetting each other and others known to the grand jury, and
aided and abetted by each other and others known to the grand jury,
knowingly transported and shipped any visual depiction using any
means or facility of interstate or foreign commerce and in or affecting
interstate or foreign commerce, by any means including by computer,
and the production of such visual depiction involved the use of a minor,
L.R., engaging in sexually explicit conduct and the visual depiction is of
such conduct,

In violation of 18 U.S.C. § 2252(a)(1) and (b) and 2.

A TRUE BILL:

Date: 12-3-13


PETER J. SMITH
United States Attorney